

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

GILBERTO PEREIRA BRITO, FLORENTIN	)	
AVILA LUCAS, JACKY CELICOURT,	)	
	)	
Petitioners,	)	
	)	
v.	)	C.A. No. 1:19-CV-11314-PBS
	)	
WILLIAM P. BARR, U.S. Attorney General, et al,	)	
	)	
Respondents.	)	
	)	

**ASSENTED MOTION TO EXTEND RESPONDENTS' DEADLINE TO RESPOND TO  
PETITIONERS' MOTION FOR SUMMARY JUDGMENT AND MOTION TO MODIFY  
THE CLASS DEFINITION**

Respondents request an extension of their deadlines to respond to Petitioners' above referenced motions. Specifically, Respondents request that the Court grant an extension for their opposition deadlines up to and including September 23, 2019. Petitioners have assented to this extension request. This request is made in good faith and not for the purpose of delay as set forth herein:

1. On August 29, 2019, Petitioners filed a Motion for Summary Judgment (ECF Nos. 67, 68) and a Motion to Modify Class Definition (ECF Nos. 72, 73). Pursuant to Local Rule 7.1(b)(2), Respondents' current deadlines to file their oppositions to Petitioners' Motion to Modify Class Definition and Motion for Summary Judgment are September 12, 2019 and September 19, 2019, respectively.

2. Respondents are seeking an unopposed extension on both of the above-referenced deadlines. Specifically, Respondents request the Court to set September 23, 2019, four days after the September 19, 2019 deadline, as the deadline for both responses.

3. In the interest of judicial economy, all parties agree that Respondents will submit a single, consolidated response to both motions.

4. On September 3, 2019, Respondents' undersigned counsel contacted counsel for the Petitioners about this motion. On September 4, 2019, Petitioners' counsel indicated that they assent to this motion.

Accordingly, Respondents ask the Court to grant their request for an extension of time on the filing of replies.

DATE: September 9, 2019

Respectfully submitted,

JOSEPH H. HUNT  
Assistant Attorney General  
Civil Division

WILLIAM C. PEACHEY  
Director  
Office of Immigration Litigation  
District Court Section

ELIANIS N. PÉREZ  
Assistant Director

J. MAX WEINTRAUB  
Senior Litigation Counsel

C. FREDERICK SHEFFIELD  
Senior Litigation Counsel

/s/ Huy M. Le  
HUY M. LE  
M.A. BBO No. 697256  
Trial Attorney  
United States Department of Justice  
Civil Division  
Office of Immigration Litigation  
District Court Section  
P.O. Box 868, Ben Franklin Station  
Washington, D.C. 20044  
Telephone: (202) 353-4028  
Facsimile: (202) 305-7000  
E-mail: Huy.M.Le2@usdoj.gov

*Attorneys for Respondents*

**CERTIFICATE OF SERVICE**

Civil No. 1:19-cv-11314-PBS

I hereby certify that this document will be filed through the electronic filing system of the Court, which system will serve counsel for all parties.

Dated: September 9, 2019

/s/ Huy M. Le

By: HUY M. LE

Trial Attorney

**CERTIFICATE OF RULE 7.1 CONFERENCE**

I hereby certify that, in accordance with Local Rule 7.1, Respondents discussed this motion with counsel for Petitioners on September 3, 2019, and on September 4, 2019, counsel for Petitioners indicated that they assent to the motion.

Dated: September 9, 2019

/s/ Huy M. Le

By: HUY M. LE

Trial Attorney